

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

WYNNE TRANSPORTATION HOLDINGS,
LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 25-10027 (KBO)

(Jointly Administered)

Hearing Date: April 11, 2025 at 10:00 a.m. [ET]

Deadline: April 4, 2025 at 4:00 p.m. [ET]

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING
THE RETENTION AND EMPLOYMENT OF STEVENS & LEE P.C.
AS ATTORNEYS FOR ALFRED T. GIULIANO, CHAPTER 7 TRUSTEE,
PURSUANT TO 11 U.S.C. §§ 327(A) AND 328(A), FED. R. BANKR. P. 2014
AND DEL. BANKR. L.R. 2014-1 EFFECTIVE AS OF FEBRUARY 28, 2025**

TO: THE U.S. TRUSTEE, DEBTOR'S COUNSEL, THIRTY (30) LARGEST UNSECURED CREDITORS, COUNSEL FOR THE DIP LENDER, THE INTERNAL REVENUE SERVICE, THE UNITED STATES ATTORNEY'S OFFICE FOR THE DISTRICT OF DELAWARE, THE STATE ATTORNEYS GENERAL FOR EACH STATE IN WHICH THE DEBTORS CONDUCT BUSINESS, CREDITORS THAT HOLD CLAIMS FOR WHICH PROOFS OF CLAIM HAVE BEEN FILED, AND ALL PARTIES WHO HAVE REQUESTED NOTICE IN THESE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 2002

PLEASE TAKE NOTICE that on March 13, 2025, Alfred T. Giuliano (the "Trustee"), the chapter 7 trustee for the jointly administered estates of Wynne Transportation Holdings, LLC, *et al.* (the "Debtors") has filed a motion for the entry of an order pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014, and Del. Bankr. L.R. 2014-1, authorizing the employment and retention of the law firm of Stevens & Lee P.C. ("Stevens & Lee") as his attorneys in these cases effective as of February 28, 2025 (the "Motion").

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed on or before April 4, 2025 at 4:00 p.m. (ET) with the United States Bankruptcy Court for the District of Delaware at 824 N. Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection or response upon the undersigned counsel.

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtors' federal tax identification number, are: Wynne Transportation Holdings, LLC (0566), Wynne Transportation, LLC (8255), Coastal Crew Change Company, LLC (9550), WTH Commercial Services, LLC (9379), Southwest Crew Change Company, LLC (8777), Great Plains Crew Change Company, LLC (5926), and Allegheny Crew Change Company, LLC (9234). The Debtors' address is 14110 N. Dallas Parkway, Suite 240, Dallas, Texas 75254.

A HEARING ON THE MOTION WILL BE HELD ON **APRIL 11, 2025 AT 10:00 A.M. (ET)** BEFORE THE HONORABLE KAREN B. OWENS, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 13, 2025

STEVENS & LEE, P.C.

/s/ Joseph H. Huston, Jr.
Joseph H. Huston, Jr. (No. 4035)
919 North Market Street
Suite 1300
Wilmington, DE 19801
Tel: (302)425-3310
Fax: (610) 371-7972
Email: joseph.huston@stevenslee.com

-and-

Jason Manfrey, Esquire
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406
Telephone (610) 205-6054
Facsimile (610) 371-7958
Email: jason.manfrey@stevenslee.com

*Proposed counsel for Alfred T. Giuliano, chapter 7
Trustee for Wynne Transportation Holdings, LLC,
et al.*